

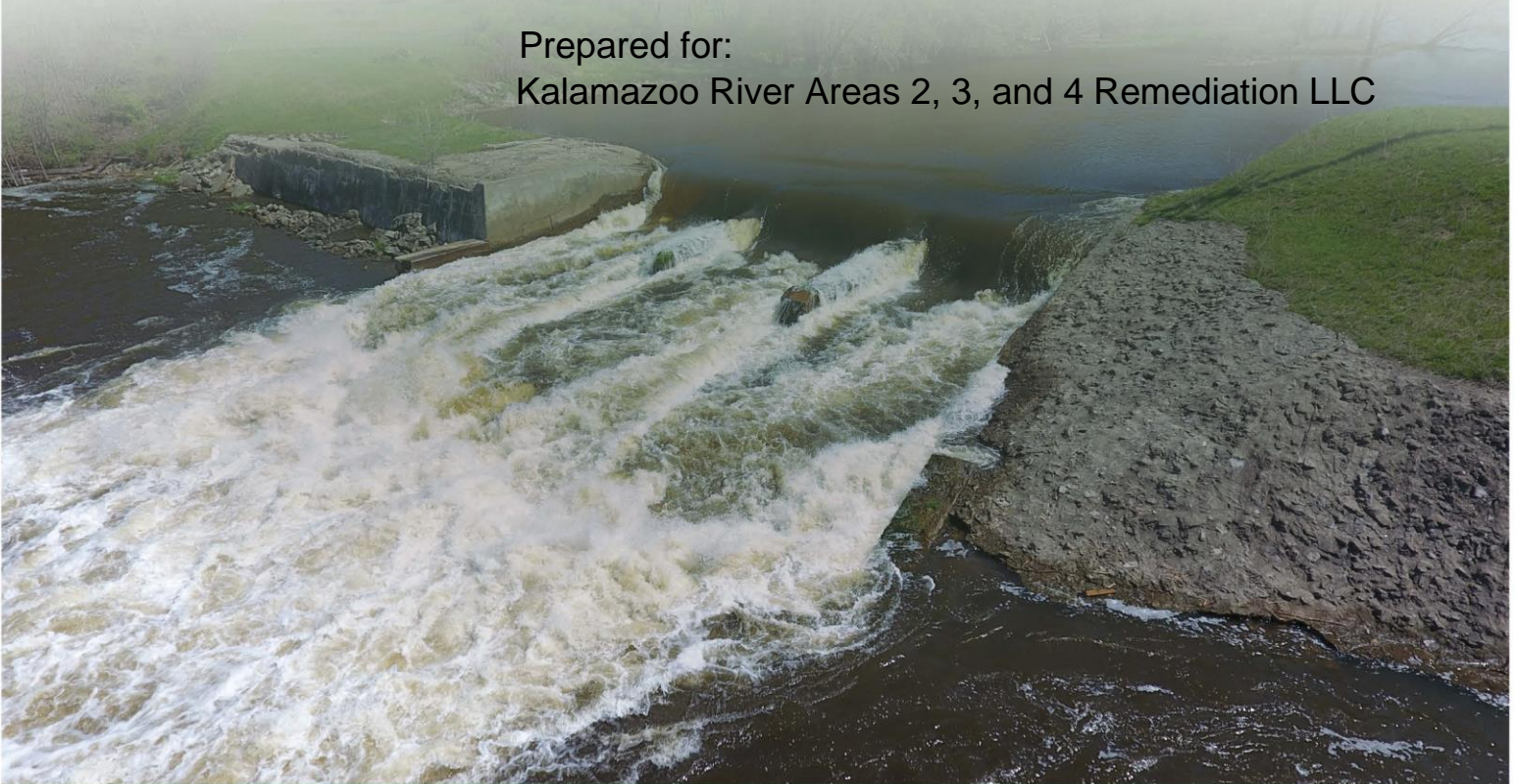


May 6, 2022

Monthly Report

OU5 Area 4 Time-Critical Removal Action Allied Paper/Portage Creek/ Kalamazoo River Superfund Site

Prepared for:
Kalamazoo River Areas 2, 3, and 4 Remediation LLC





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May 6, 2022
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1. Area 4 TCRA Schedule

Abbreviations and Acronyms

CD	Consent Decree
EPA	United States Environmental Protection Agency
GEI	GEI Consultants of Michigan, P.C.
LLC	Kalamazoo River Areas 2, 3, and 4 Remediation LLC
OU5	Operable Unit 5
PCB	polychlorinated biphenyl
NCR	NCR Corporation
TCRA	time-critical removal action

Introduction

Reporting Period: April 1, 2022, to April 30, 2022. Report #24.

GEI Consultants Inc. (GEI) is pleased to provide this Monthly Report for Area 4 of Operable Unit 5 (OU5) of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (Site). This work will be performed by GEI on behalf of the Kalamazoo River Areas 2, 3, and 4 Remediation LLC (LLC), which NCR Corporation (NCR) formed to meet certain requirements of the Consent Decree (CD) between NCR Corporation, the United States Environmental Protection Agency (EPA), and the state of Michigan.

The CD was lodged in December 2019 and entered (approved) by the United States District Court for the Western District of Michigan on December 2, 2020. The CD requires NCR to conduct response activities in Areas 2, 3, and 4 of Operable Unit 5 of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site. Work activities mandated by the CD include performance of a time-critical removal action (TCRA) in Area 4, remedial design and remedial action in Area 2, and, unless an opt-out is exercised, remedial design and remedial action in Area 3.

This monthly report provides updates on events pertaining to the Area 4 TCRA as defined in the Area 4 Action Memorandum (EPA, 2020).

1. Work Accomplished

1.1 Actions Taken

- Meetings between LLC and EPA representatives took place on April 6, 14, 20, and 28, 2022, to discuss the revised design plan.
- Biweekly Area 4 TCRA coordination calls were held on April 14 and 28, 2022.
- Premobilization documentation was submitted to EPA for PDI Phase 3 on April 14, 2022.
- LLC representative participated in a site walk on farmland adjacent to Subarea E (Peterson Farm) to discuss conversion of irrigation pumps to wells on April 19, 2022.
- Meetings between LLC and EPA representatives took place on April 19, 2022, to discuss a QAPP revision to include sampling anticipated in Phase 3 pre-design investigations.
- A preliminary approach to Phase 3 PDI sampling was shared with EPA on April 25, 2022 and discussed on April 28, 2022.
- Planning and procurement activities for upcoming field work took place.

1.2 Data

- No data was collected, received, or delivered in April 2022.

1.3 Deliverables

- A revised draft Field Monitoring Plan (FMP) was submitted to EPA on April 1, 2022.
- A 60% design package response to comments was submitted to EPA on April 7, 2022.

2. Problems Encountered

- No problems were encountered that impacted work schedules.

3. Community Relations Activities

- LLC representatives attended the Kalamazoo River Superfund Community Advisory Group meeting on April 28, 2022.

4. Anticipated Work

- A revised Phase 3 PDI work plan addendum is expected to be submitted to EPA.
- A revised FMP is expected to be submitted to EPA.
- A Phase 3 PDI addendum covering geotechnical sampling is expected to be submitted to EPA.
- A buoy line upstream of the Trowbridge Dam is expected to be installed.
- Spring sampling efforts are expected to be scheduled upon approval of the Phase 3 PDI work plan addenda.
- Bi-weekly TCRA coordination calls with stakeholders are expected to continue.
- Design activities are expected to continue.

5. Waste Tracking

No project waste was created or transported in April 2022.

6. Project Schedule

An updated schedule for the Area 4 TCRA is included as Fig. 1.

7. References

EPA (2020). Approval for a Time-Critical Removal Action at the Trowbridge Dam Area of the Allied Paper, Inc./Kalamazoo River Superfund Site, Allegan County Michigan (EPA ID MID006007306). April 2020.

United States District Court for Western District of Michigan Southern Division (2019). Consent Decree With NCR Corporation. December 2019.

Figure 1. Area 4 TCRA Schedule		Start Date	Finish Date
Work Plans			
	Field Sampling Plan	14-Feb-20	15-May-20
	Supplemental Field Sampling Plans	7-Sep-20	15-Jul-21
	Removal Action Work Plan	1-Apr-20	23-Oct-20
	Area 4 Design Work Plans	1-Aug-20	15-Dec-21
	Programatic/Investigation Work Plan Revisions	15-May-20	5-Jan-22
Preliminary Investigation			
	PDI Procurement & Permitting	4-Apr-20	23-Oct-20
	Sediment and Soil Sampling Phase 1	17-Jun-20	23-Oct-20
	Lab Analysis Phase 1	22-Jun-20	7-Dec-20
	Data Validation Phase 1	6-Jul-20	12-Dec-20
	Water Monitoring (velocity, turbidity, level)	10-Jul-20	27-Nov-25
	Geotechnical Sampling and Analysis	26-Oct-20	7-Jan-21
	Ecological Activity (bat tree, mussel survey, etc.)	1-Jun-20	31-Oct-21
	Area 4 PDI Phase 1 Data transmittal	7-Jan-21	8-Jan-21
	PDI Fieldwork 2021 (Phase 2)	3-May-21	13-Jul-21
Design			
	Trowbridge Site Preparation Design & Bid	6-Apr-20	1-Apr-21
	Trowbridge Water Control Structure 30% Design	24-Aug-20	29-Jan-21
	Trowbridge Dam Removal Design	24-Aug-20	15-Dec-21
	30% TCRA Removal Design Submittal	16-Apr-20	11-May-21
	60% TCRA Removal Design Submittal	7-May-21	8-Nov-21
	Revised TCRA Removal Design Submittal	8-Nov-21	Summer 2022
Construction			
	Area 4 Procurement	14-Apr-20	31-Dec-22
	Area 4 Trowbridge Staging Area	16-Aug-21	27-Aug-21
	Area 4 Permitting Equivalency and Initiate Access Clearing/Grubbing	15-Jul-22	27-Nov-22
	Area 4 Construction Work 2023	1-Apr-23	27-Nov-23
	Area 4 Construction Work 2024	1-Apr-24	24-Nov-24
	Area 4 Construction Work 2025	1-Apr-25	27-Nov-25
	Area 4 Construction Work 2026	1-Apr-26	1-Nov-26
Final Report		22-Feb-27	8-Apr-27

Note: Schedule is subject to change. Changes will be reported in monthly progress reports.